ORDER NO.: G25 CONTRACT ID. NO.: C00061322C02

ATTACHMENT 2 [Navy Waste Management Procedures]

HAZARDOUS WASTE MANAGEMENT PROCEDURES – VDOT FLEET REC PARK CONTRACT OPERATIONS

The Navy's Regional Environmental Group has established several procedures to ensure that the processes associated with a VDOT contract or a VDOT contractor's generation, accumulation, storage, transportation and disposal of a Hazardous Waste is conducted in accordance with all applicable Federal, State and Navy regulations. Procedures related to the generation, accumulation and storage of Hazardous Waste are consistent regardless of what the contract states. Procedures associated with the transportation and disposal of Hazardous Waste are dependent on the specific language of the contract.

PROCEDURES FOR THE GENERATION, ACCUMULATION AND STORAGE OF HAZARDOUS WASTE

 The Regional Environmental Group must be contacted prior to the generation of any Hazardous Waste. The Regional Hazardous Waste Program Managers are:

Mr. Tom Kowalski

445-6775

Naval Station Norfolk

PROCEDURES FOR TRANSPORTING AND DISPOSING OF HAZARDOUS WASTE

The contract states that the VDOT Contractor will manage and dispose of all Hazardous Waste either generated or discovered during the project the following procedures are to be followed.

The contractor is designated under contract for the management and eventual disposal of hazardous waste, the contractor is responsible and liable to ensure that all wastes are disposed of according to all Federal and State Environmental Regulations. Also the contractor is responsible to ensure that all associated paperwork and records are signed and turned over to the Navy.

NOTE: All aspects of Hazardous Waste Management are subject to inspection by the Regional Environmental Group to ensure that Federal, State and Navy regulatory compliance is maintained at all times.

Waste Determination

The contractor must determine if the waste is a solid or hazardous waste in accordance with Federal and State Regulations using documented process knowledge or the appropriate analytical methods. A copy of the documentation must be submitted to the Regional Environmental Group.

While the container is in the possession of the contractor, the designated site custodian must ensure the container is managed according to all applicable Federal, State, and Navy regulations as follows:

- The contractor shall designate a Site Custodian or Site Manager. The Site Custodian or Site Manager must provide a 24-hour phone number where he may be contacted in the event of an emergency.
- 2. The contractor shall ensure that personnel are trained in hazardous waste management procedures to comply with the requirements of 40 CFR 262.34 and 265.16.

The Regional Environmental Group Hazardous Waste Media Manager or designated environmental official will review the waste generating processes to determine the best management practice concerning the identification, generation, management, accumulation, and disposal of any hazardous waste.

 The contractor, in conjunction with the HW Manager, shall establish a temporary <u><90-Day</u>
 <u>Hazardous Waste Accumulation Area</u> (HWAA) or a <u>Satellite Accumulation Area</u> (SAA).
 These accumulation areas are not contractor lay-down areas.



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NOTE: All Hazardous Waste Accumulation Areas (HWAA) require Virginia State Department of Environmental Quality. It is requested that, when possible, the HW receives notification 15 days <u>prior</u> to the start of accumulation. All notifications to regulators will originate from the Regional Environmental Group.

2. The HW Manager shall provide a training session for the Site Custodian or Site Manager for management of SAA or HWAA.

While the waste container is in the possession of the contractor, the designated site custodian must ensure the container is managed according to all applicable Federal, State, and Navy regulations.

Satellite Accumulation Areas (SAA) must be:

Established at or near the point of generation,
Free of any spills,
Located within 50 feet of a fire extinguisher,
Equipped with a spill response kit.
Have a cumulative total of not more than 55 gallon of all non-acute hazardous wastes

OR

Have a total of one quart of all acutely hazardous wastes

AND

The container must be:

Maintained to a volume of 55 gallons or less, Kept closed at all times except when adding waste, Maintained in good condition, Marked with the words "HAZARDOUS WASTE" and name of the waste, Dated when full.

Less Than 90-Day Hazardous Waste Accumulation Areas (HWAA) must be:

Designated in writing, Located within 50 feet of a fire extinguisher, Equipped with a spill response kit, Inspected (written) every 7 days, Managed by trained personnel.

AND

The containers must be:

DOT approved,
Kept closed at all times except when adding waste,
Maintained in good condition,
Marked with the words "HAZARDOUS WASTE" and name of the waste,
Dated when first drop is added,
Stored less than 90-days.

Applicable Federal Regulations include 49 CFR 173 and 178, 40 CFR 260 thru 266, 40 CFR 268, 40 CFR 271 thru 273, 40 CFR 279 and 280 and 40 CFR 761; as well as Virginia Solid Waste Management Regulations 9 VAC 20-80 et seq.